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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**
SACRAMENTO DIVISION

19 REPUBLICAN NATIONAL COMMITTEE,

20 Plaintiff,

21 v.

22 GOOGLE INC.

23 Defendant.
24

Case Number: 2:22-CV-01904

**JOINT MOTION TO EXTEND
DEADLINE TO FILE AMENDED
COMPLAINT AND RESPONSE**

1 Plaintiff Republican National Committee and Defendant Google LLC hereby jointly
2 move to extend the deadline to file an amended complaint to Tuesday, October 10, 2023, and
3 the deadline to respond to that amended complaint to Thursday, November 16, 2023.

4 On October 21, 2022, Plaintiff filed its complaint. See Doc. 1. After an extension,
5 Defendant, on January 23, 2023, moved to dismiss Plaintiff's complaint. See Docs. 14 & 30.
6 On March 27, 2023, after additional extensions granted to both parties, the parties completed
7 briefing regarding the motion to dismiss. See Docs. 35 & 38.

8 On July 13, the Court held a hearing on the motion to dismiss. See Docs. 49-50. And
9 on August 23, the Court granted Defendant's motion to dismiss "with leave to amend to
10 establish that section 230 does not apply to this action, and to amend Counts Three and Four,"
11 and the Court ordered that "Plaintiff must file any amended complaint within thirty days of the
12 entry of this order." Doc. 53 at 38; *Republican Nat'l Comm. v. Google, Inc.*, 2023 WL 5487311,
13 at *20 (E.D. Cal. Aug. 24). Moreover, Federal Rule of Civil Procedure 15 states that "[u]nless
14 the court orders otherwise, any required response to an amended pleading must be made
15 within the time remaining to respond to the original pleading or within 14 days after service of
16 the amended pleading, whichever is later." Fed. R. Civ. P. 15(a)(3).

17 Plaintiff and Defendant jointly requests extensions of the deadline to file an amended
18 complaint to Tuesday, October 10, 2023, and the deadline for Defendant's response to that
19 amended complaint to Thursday, November 16, 2023. Good cause exists to grant the
20 extensions, so that Plaintiff has time to adequately address the Court's August 23, 2023
21 decision and Defendant has time to adequately address Plaintiff's amendments. This case
22 involves numerous complex issues of state and federal law, and the Court's decision requires
23 adding certain factual information. For similar reasons, additional time to respond to the
24 amended complaint is warranted.

25 Plaintiff will suffer significant prejudice if the extension is not granted because it needs
26 sufficient time to address the Court's decision and the numerous issues involved in this case.
27 And Defendant will similarly suffer significant prejudice without additional time to respond to
28 the amended complaint. The parties also agree that neither party will suffer any prejudice if

the Court grants the requested extension of time. The parties have extended several deadlines in this case already, and the parties do not believe that this additional extension will affect the progress of the case.

Therefore, Plaintiff and Defendant jointly request the following:

1. The deadline for Plaintiff to file an amended complaint is Tuesday, October 10, 2023; and
2. The deadline for Defendant to respond to the amended complaint is Thursday, November 16, 2023.

Date: September 21, 2023 By: /s/ Michael A. Columbo

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Date: September 21, 2023 By: /s/ Sunita Bali

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on September 21, 2023:

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